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**CDM**

environmental engineers, scientists,  
planners, & management consultants

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February 17, 1986

Mr. John Cochran  
U. S. Environmental Protection Agency  
First International Building  
1201 Elm Street  
Dallas, Texas 75270

Doc. Ctrl. No. 143-TS1-EP-CFED-1

RE: South Cavalcade Street Site Compliance Monitoring

Dear John:

Because of circumstances that have occurred repeatedly with respect to CDM's compliance monitoring work at South Cavalcade Street Site, I feel compelled to put in writing some of my concerns and frustrations, as well as those of the field personnel performing the actual monitoring effort. Partly related is the difficulty CDM recently encountered when we attempted to obtain a key to unlock previously installed monitor wells on the North Cavalcade Street Site.

CDM's approach to compliance monitoring at both the Texarkana and the South Cavalcade Sites has been to work with the PRP's and their engineers to ensure that the field investigation portion of the RI is as valid and complete as possible. Although CDM is functioning as EPA's eyes and ears, we do not view our role as some silent mechanical recorder dutifully noting all to report back to EPA. When problems are noted, we also bring them to the attention of the onsite coordinator or his (her) designated representative and try to offer constructive suggestions or solutions. There are even times when CDM personnel pitch in and help rather than stand idly by while others struggle with some problem that is slowing progress. I think this has worked very well at the Texarkana Site, and Shannon Craig has expressed appreciation of the spirit of cooperation and helpfulness she and the contractor have been accorded.

This same spirit of cooperation between CDM and Kopper's Company's contractor at the South Cavalcade Street Site, McBride-Ratcliff, is distinctly lacking. I believe CDM has made the same good-faith effort to work with McBride-Ratcliff at this site as we have at the Texarkana Site. The same PRP is involved and the same CDM people are involved; the only difference is the contractor. In truth, I believe CDM has established a good working relationship with McBride-Ratcliff's field personnel. But this relationship and our compliance monitoring work are hampered by the complete uncooperativeness of the onsite coordinator, Bill Tobin. Rather than accept our presence, and work with us, he seems to view us as enemy spies and goes out of his way to make things difficult. As of Friday, February 14, Bill has instructed his field personnel not to communicate directly with CDM personnel nor to fraternize in any way with CDM personnel. Other specific problems are as follows:

- \* Failure to notify us when work would be initiated. On January 13, 1986, the day scheduled to initiate the power auger boring program at the South Cavalcade Street Site, a CDM person arrived at the site before 8 AM only to be informed that work would be begun

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later that morning. When the CDM person returned at mid-morning, as rescheduled, he was informed that there would be further delays. This exercise was repeated again at noon; at that time CDM requested that we be called when McBride Ratcliff was ready to begin. At the end of the day we were notified, in a by-the-way manner, that boring had been initiated earlier in the afternoon, and two holes had already been drilled.

\* Failure to provide sufficient warning that work on the weekend would be necessary. Notification on Friday afternoon that McBride-Ratcliff intends to work through the weekend is insufficient lead time to allow readjustment of personnel schedules. We have always responded, but at some personal sacrifice.

\* Failure to work when weekend work was scheduled. Recently we were informed, within 48 hours this time, that work on Saturday would be necessary. This meant that one of our people would have to alter their plans and remain at the site over the weekend, but the adjustment was made. On the appointed Saturday, however, work was initiated late and terminated before noon, with very little real progress. The CDM person's schedule had been disrupted and expenses incurred, with very little benefit to EPA or to the PRP.

\* Failure to notify us when there would be no work during a regularly scheduled work period. On Monday of this week, we were informed that there would be no work on the site that day. On Tuesday, work was performed on the site, but we were told that there would be no work on Wednesday. Wednesday night when CDM people contacted McBride-Ratcliff, we were told that there would be no work performed on Thursday and probably not on Friday and that earlier in the week the onsite coordinator had stopped further work for the time being. We were never notified by the onsite coordinator that our presence would be unnecessary and discovered it only when we initiated the contact. On Thursday night, however, CDM was called and told that there would be work performed off-site on Friday.

Because of the need for extra personnel at the North Cavalcade Site to sample the monitor wells, a special effort was necessary to ensure that compliance monitoring at the Texarkana Site and the South Cavalcade Street Site would be fully covered. This effort proved to be largely unnecessary and a needless expense to EPA. Only 10 shallow power auger borings were made during the week; on Tuesday and within a few hours on Friday.

\* Failure to respond to requests for copies of field notes. Despite repeated requests and a letter from you, McBride-Ratcliff has not provided copies of their field notes. The field personnel have informed us that they cannot give us copies without Bill Tobin's permission; thus far, Bill has refused to grant permission or to provide copies himself. He even ignores our calls.

\* It also appears that once again, McBride-Ratcliff is wanting to lengthen the communication path unnecessarily and isolate itself from EPA and CDM by requesting that communications between CDM and MRA go through you. My understanding is that the field personnel of one firm can contact the field personnel of the other firm with regards to such matters as scheduling and emergencies. This makes sense to me; I think it is ridiculous to follow a lengthy chain of command from us, through you, to Koppers, to RMA and back again. That only wastes time and money and impedes performance of the work. CDM does not view itself as some foreign entity that cannot have civil communications

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directly with McBride-Ratcliff, at least over such simple matters as work schedule. As indicated above, we have tried to work with McBride-Ratcliff and would rather that we could instead of against them.

\* As yet, we have received no Work Plan or Health & Safety Plan for the South Cavalcade Street Site. All we have received are SOP's. A Work Plan would be helpful from the standpoint of scheduling and knowing their action levels. When the deep boring and monitor well installation programs are initiated, we will need to collect sample splits for analysis at the CLP. As you know, one does not simply call SMO and tell them that you are shipping samples the next day.

In addition, when we attempted to obtain a key from Bill Tobin for previously installed wells on the North Cavalcade Street Site, he refused. These wells were originally installed by CDM and McClelland Engineers for the Harris County Metropolitan Transit Authority. The wells are not Bill Tobin's personal property; they do not belong to Koppers Company, McBride-Ratcliff's client; and, as I recall, Mrs. Eichenour gave us permission to enter and take samples from her property. I can think of no valid basis for Bill Tobin to withhold the key to the wells other than to be obstructive.

Furthermore, with respect to work being performed by McBride-Ratcliff for Koppers Company at the South Cavalcade Street Site, we have several concerns.

\* Most of the shallow power auger borings are terminated at a depth of eight feet or less. Only about three borings have been advanced to 14 feet. The four off-site borings made on Friday, February 14 were terminated at a depth of 4 feet, which is hardly a sufficient depth to determine whether or not contamination has migrated off-site. Based on experience at the North Cavalcade Street Site, power auger borings can be advanced to the depth of the flowing sand, at approximately 18 feet. Although the depth from which cuttings came cannot be determined precisely, the key issue is not the exact depth, but whether or not contamination is present. The best use of the power augering program has not been made.

\* At the completion of the shallow power auger borings, the holes are backfilled with dry bentonite powder or, occasionally, native material. We are concerned that the powder will simply float on and subsequently bridge across the hole at the water table, which is typically less than eight feet in depth. No attempt is made to ascertain whether bridging has occurred nor are calculations made of the amount of bentonite needed to fill the hole.

\* Decontamination procedures and health and safety at the South Cavalcade are at times, a little lax. Occasionally, augers are not fully decontaminated between holes and barriers are removed before holes are filled with bentonite. At least once, Bill Tobin has showed up at the drilling site in street clothes. CDM does believe that the field personnel at the South Cavalcade Street Site are attempting to do a good job; however, conflict between the onsite personnel and the onsite coordinator creates an atmosphere in which less than a 100 percent effort is always given.

\* Finally, and a minor point that only indirectly affects performance at the South

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Cavalcade Street Site, is the lack of sanitary facilities. It would seem that any organization that can afford a large trailer with sleeping accommodations could afford at least a portapotty. As it is, when nature calls, the field personnel must decontaminate and go to one of the local restaurants or across Cavalcade Street to use our portapotty. Now we don't mind sharing, that not the point, it just seems like an unnecessary waste of time and money.

I doubt that all conflicts between CDM and McBride-Ratcliff can be resolved, given the personalities involved. Hopefully though, perhaps with some pressure from you through Koppers, the circumstances can be improved. CDM's impression so far is that Koppers genuinely wants to do the best possible job, for which they should be encouraged and commended. Thus, I doubt it is in their best interest to allow conflict between their engineer at the South Cavalcade Street Site and EPA's engineer performing compliance monitoring to continue.

Sincerely yours,  
CAMP DRESSER & MCKEE INC.



Robert S. Kier  
Site Manager

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